

COMMUNICATION OF PROGRESS

DATA RESPONS GROUP 2021



CONTENT

1. CEO STATEMENT	2
2. HUMAN RIGHTS	5
3. LABOUR	5
4. ENVIRONMENT	6
5. ANTI-CORRUPTION	5





EXECUTIVE SUMMARY FOR 2020



GERMANY

FRANCE

UNITED KINGDOM

CEO STATEMENT

If there is ever going to be a massive investment in new, green technology, it is now. Digitization has already shown to be a key tool in reducing energy consumption (IEA). As a technology company delivering R&D engineering services, software, hardware and IoT solutions, we believe we can make an important difference, enabling the green shift.

Microsoft CEO Satya Nadella noted in April 2020 that "we've seen two years' worth of digital transformation in two months." The tech industry digital already deeply embedded in is transformations across all industries. We are thus already in place as change agents who work every day to enable a digital future in the public and private sector. Our role as an enabler for digitalization industrial provides many opportunities for our specialists to use their green tech know-how across industries. Thus, being part of the force that changes operations and value chains in a positive direction.

To keep the value of our common effort for sustainability as integrated part of business and the society in general, we have in 2020 signed "the guide against green washing" to emphasize that this only has true value if we really mean it! We have also adapted to new challenges over night and learnt to work 100% digitally. Despite Covid-19, we have continued to deliver our expertise and achieved new highs. At the same time, we have seen increased interest for our ESG-contents. Climate change, the corona pandemic and new regulations, like the EUtaxonomy, have all contributed to an increased focus on sustainability.

Last year we delivered our first sustainability report. This year we have strengthened our reporting on both environmental, social and governance topics including emissions, energy use, materials, positive and professional corporate culture, equal treatment, skills development, responsible purchasing, legal and appropriate conduct and human rights.



Kenneth Ragnvaldsen, CEO Data Respons



2. HUMAN RIGHTS

Assessment, policy and goals

Data Respons is committed to respecting and promoting human rights of all individuals potentially affected by our operations. We support the principles underlying the Universal Declaration of Human Rights, the UN Global Compact and ILO's eight core conventions. Our human rights policy is based on the UN Guiding Principles on Business and Human Rights.

Our main business operations are located in Europe where we consider human rights to be assured in working environments. However, we also have a location in Taiwan where we produce technology. Data Respons has conducted quality assessments there in 2019 and 2020 to make sure human rights are assured.

Relevant policies:

- <u>Code of conduct (Data Respons companies and employees must comply)</u>
- Data Respons Supplier Conduct Principles
- United Nations 10 principles (Data Respons companies, employees and
- partners must comply)

Data Respons Conflict Mineral Policy

Actions taken:

We continue to onboard subsidiaries and new employees on our Code of Conduct. We also improve our ESG reporting year on year by recruiting ESG ambassadors across our company and by improving our reporting procedures.

Goals for 2022:

- 1. Continue our communication of the Code of Conduct and its content to existing and new employees
- 2. Conduct sustainability audits at 3 largest suppliers in Taiwan during 2022
- (not conducted in 2021 due to Covid19)

3. Zero serious work-related incidents reported within Data Respons companies



3. LABOUR

Assessment, policy and goals

Data Respons Supplier Conduct Principles are based upon internationally accepted and advocated principles for ethical and legally compliant business practices. Data Respons expects that its partners and suppliers will comply with the principles and will actively promote such principles with their own partners and suppliers.

Data Respons supports and respects the freedom of association and the right to collective bargaining within national laws and regulations. We are opposed to all forms of human trafficking and child labour abuse and shall not employ or contract any forced or compulsory labour. We comply with the UN Guiding Principles of Business and Human Rights

Relevant policies:

- Universal labour rights are included in the Data Respons Supplier Conduct Principles
- Code of conduct (Data Respons companies and employees must comply)
- Data Respons Conflict Mineral Policy

Actions taken:

We continue to onboard subsidiaries and new employees on our Code of Conduct. We also improve our ESG reporting year on year by recruiting ESG ambassadors across our company and by improving our reporting procedures.

Goals for 2022:

- 1. Continue our communication of the Code of Conduct and its content to existing and new employees
- 2. Map the integration of our Code of Conduct in the local annual employee survey's
- 2. Conduct sustainability audits at 3 largest suppliers in Taiwan during 2022 (not conducted in 2021 due to Covid19)
- 3. Zero serious work-related incidents reported within Data Respons companies

Data Respons AS – GC COP 2021



4. ENVIRONMENT

Assessment, policy and goals

At Data Respons, we firmly believe that the implementation of new technology is a key enabler for a more sustainable world. Consequently, we have set a target of contributing to a minimum of 100 sustainable technology projects during 2020. Nevertheless, we recognise the environmental and social impact of our business development and have started a journey to become Co2 neutral by 2025.

On our road to becoming Co2 neutral Data Respons is currently undertaking a full Scope 3 mapping process to identify our footprint and understand what challenges we need to tackle first. During 2021 we will implement carbon budgets for every daughter company and continue to make the necessary changes in the way we do business.

Relevant policies/documents:

- <u>Code of conduct (Data Respons companies and employees must</u>
- comply)
- Data Respons Supplier Conduct Principles
- Data Respons ESG report 2020
- <u>Article on how Data Respons will become carbon neutral</u>

Actions taken:

2020 marked our first Scope 3 report, and we now have better understanding of how much carbon our operation represents and what our biggest emission factors are. In 2020 we mobilized dedicated sustainability ambassadors in every daughter company. We have worked with each company on carbon reduction plans.

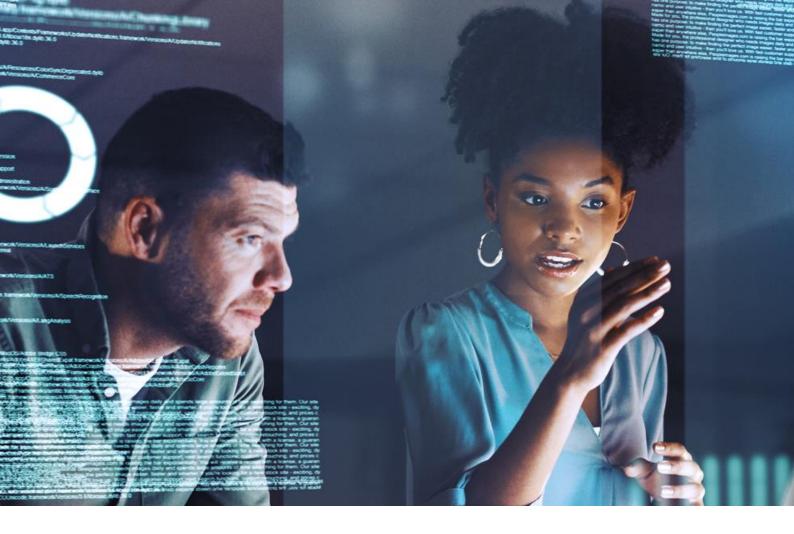
We also sent ta letter to our suppliers where we invited them to join us on the journey towards becoming carbon neutral, but also stating that environmental factors will be a part of supplier selection process going forward.

Data Respons joined <u>Carbon Neutral Now</u> in 2020 as one of our initiatives on our road to becoming carbon neutral by 2025.

Goals for 2022:

- 1. Continue implementing our sustainability strategy across the group
- 2. Set up concrete actions plans for every daughter company on how to become CO2 neutral by 2025
- 3. Conduct a minimum of 100 sustainable technology customer projects across the group
- 4. Ramping up sustainability dialogues with our customers and suppliers





5. ANTI CORRUPTION

Assessment, policy and goals

Data Respons does not tolerate corruption in the private or the public sector. We are committed to complying with all applicable laws and regulations enacted to fight corruption and bribery

Relevant policies/documents:

- Code of conduct (Data Respons companies and employees must comply)
- Anti-Corruption certification, ISO37001, has started in the organization
- Data Respons Supplier Conduct Principles

Actions taken:

We continue to onboard subsidiaries and new employees on our Code of Conduct. We also improve our ESG reporting year on year by recruiting ESG ambassadors across our company and by improving our reporting procedures.

We also sent ta letter to our suppliers where we invited them to join us on the journey towards becoming carbon neutral, but also stating that environmental factors will be a part of supplier selection process going forward.

Goals for 2022:

8

- 1. Reminding employees about the Code of Conduct and our Whistle blower service in our internal channels
- 2. Continue integrating the Data Respons Code of Conduct in any relevant on-boarding programs